

10A-3-2

Material to be added to a Mini-Jacket
(in the case where an e-Jacket exists)

Reg. No. SLN I0010015

Send to SIG: check box ☐

This material is:

- ☐ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label
- ☒ Other: Add to file

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Erik Kraft

Phone: 308-9358 Division: LO

Date: 1-27-09



STATE OF IDAHO

DEPARTMENT OF AGRICULTURE

DIVISION OF AGRICULTURAL RESOURCES

75
C.L. "BUTCH" OTTER
Governor
CELIA R. GOULD
Director

January 5, 2009

Document Processing Desk (SLN)
USEPA/OPP-H7504C
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Revised Special Local Need Registration (SLN) for TriAg, Ro-Neet 6-E (EPA Reg. No. 73637-5) on Sugar Beets in Idaho, SLN #ID-010015. 21

Dear Sir:

Enclosed is a revised Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), Section 24(c) Special Local Need registration (SLN) for TriAg, Ro-Neet 6-E (EPA Reg. No. 73637-5) on Sugar Beets in Idaho, SLN #ID-010015. The changes include two additions to the beginning of the DIRECTIONS FOR USE section. Two bulleted requirements were added. A copy of the SLN label being replaced is also included and is marked "OLD." In Idaho, this product will be distributed by Helm Agro, and a copy of their SLN distributor label is included for your information.

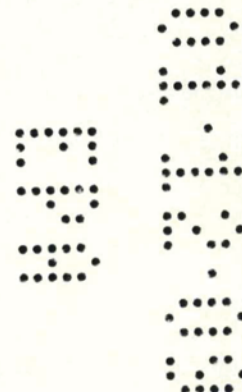
These changes were made as a result of the reregistration process and were outlined in a letter to me from Jim Tompkins, PM 25, dated July 17, 2008 (copy enclosed). The changes required in this letter were made to the federal label and references to those label changes have been added to the SLN label. All changes referenced in Mr. Tompkins letter were made in the AGRICULTURAL USE REQUIREMENTS box on the federal label. If you have any questions about this letter or the revised SLN, contact me at 208-332-8593, or via email grobinso@agri.idaho.gov.

Sincerely,

George Robinson
Bureau Chief

Enclosures

P.c.: Brenda Dowdy, Helm Agro
Ronda Hirnyck, U of I
Steve Foss, WSDA
Rose Kachadoorian, ODA



PRODUCT INFORMATION

TRI AG, INC.

**REGISTRATION FOR SPECIAL LOCAL NEED
FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF IDAHO**

RO-NEET® 6-E

EPA Reg. No. 73637-5

EPA SLN No. ID-010015

RECEIVED

DEC 05 2008

DIV. OF AG. RESOURCES

FOR WEED CONTROL IN POSTEMERGENT SUGAR BEETS

DIRECTIONS FOR USE

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Follow all applicable directions, restrictions, Worker Protection Standard requirements, and precautions on the EPA-registered label.

SUGAR BEETS: Postemergence (After The First True Leaves Have Formed) Apply 1/2 - 2/3 gallon per acre of RO-NEET 6-E after thinning and clean cultivation and incorporate to a depth of 2 to 3 inches.

or

Surface apply 1/2 - 2/3 gallon per acre of RO-NEET 6-E and incorporate using 1/2 - 3/4 inch of sprinkler irrigation water, or enough water to penetrate the soil to a depth of 3 - 4".

or

Meter 1/2 - 2/3 gallon per acre of RO-NEET 6-E into the sprinkler irrigation system using a metering device that will introduce a constant flow. Meter into sufficient water to penetrate to a depth of 3-4 inches. Time the application to insure that proper soil penetration corresponds to the end of the irrigation set. Turn the water off promptly after flushing all lines. Use the lower rate on sandy soils and the higher rate on heavier soils.

All incorporations must occur immediately after application.

Do not tank-mix with Betamix. For a list of weeds controlled see EPA registered RO-NEET 6-E label.

Apply this product only through sprinklers, including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand moved. Do not apply this product through any other type of irrigation system.

- Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.
- If you have any questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER IRRIGATION USE REQUIREMENTS

- The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

- The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
- The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
- Do not apply when wind speed favors drift beyond the area intended for treatment.

All applicable directions, restrictions and precautions on the EPA-registered label are to be followed.

This labeling must be in the possession of the user at the time of pesticide application.

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of TRI AG or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold TRI AG and Seller harmless for any claims relating to such factors.

TRI AG warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or TRI AG, and Buyer and User assume the risk of any such use. TRI AG MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, in no event shall TRI AG or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TRI AG AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TRI AG OR SELLER, THE REPLACEMENT OF THE PRODUCT.

TRI AG and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and

limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of TRI AG.

RO-NEET 6-E is a trademark of Helm Agro US, Inc.

EPA SLN NO: ID-010015

24(c) Registrant:

TRI AG, INC.

c/o Helm Agro US, Inc. / Agent

8295 Tournament Drive, Suite 310

Memphis, Tennessee 38125

EPA approved June 12, 2008

PRODUCT INFORMATION

HELM AGRO US, INC.

REGISTRATION FOR SPECIAL LOCAL NEED FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF IDAHO

RO-NEET[®] 6-E

EPA Reg. No. 73637-5-74530

EPA SLN No. ID-010015

FOR WEED CONTROL IN POSTEMERGENT SUGAR BEETS

DIRECTIONS FOR USE

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Follow all applicable directions, restrictions, Worker Protection Standard requirements, and precautions on the EPA-registered label.

SUGAR BEETS: Postemergence (After The First True Leaves Have Formed) Apply 1/2 - 2/3 gallon per acre of RO-NEET 6-E after thinning and clean cultivation and incorporate to a depth of 2 to 3 inches.

or

Surface apply 1/2 - 2/3 gallon per acre of RO-NEET 6-E and incorporate using 1/2 - 3/4 inch of sprinkler irrigation water, or enough water to penetrate the soil to a depth of 3 - 4".

or

Meter 1/2 - 2/3 gallon per acre of RO-NEET 6-E into the sprinkler irrigation system using a metering device that will introduce a constant flow. Meter into sufficient water to penetrate to a depth of 3-4 inches. Time the application to insure that proper soil penetration corresponds to the end of the irrigation set. Turn the water off promptly after flushing all lines. Use the lower rate on sandy soils and the higher rate on heavier soils.

All incorporations must occur immediately after application.

Do not tank-mix with Betamix. For a list of weeds controlled see EPA registered RO-NEET 6-E label.

Apply this product only through sprinklers, including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand moved. Do not apply this product through any other type of irrigation system.

- Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.
- If you have any questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER IRRIGATION USE REQUIREMENTS

- The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

- The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
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- Do not apply when wind speed favors drift beyond the area intended for treatment.

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HELM AGRO US warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or HELM AGRO US, and Buyer and User assume the risk of any such use. HELM AGRO US MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, in no event shall HELM AGRO US or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF HELM AGRO US AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF HELM AGRO US OR SELLER, THE REPLACEMENT OF THE PRODUCT.

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sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of HELM AGRO US.

RO-NEET 6-E is a trademark of Helm Agro US, Inc.

EPA SLN NO: ID-010015

24(c) Registrant:
TRI AG, INC.
c/o Helm Agro US, Inc. / Agent
8295 Tournament Drive, Suite 310
Memphis, Tennessee 38125

EPA approved June 12, 2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

RECEIVED
JUL 21 2008
DIV OF AG RESOURCES

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

July 17, 2008

Mr. George Robinson
Idaho State Department of Agriculture
P.O. Box 790
Boise, ID 83701

Dear Mr. Robinson:

Subject: Special Local Need Label
EPA SLN No. ID-010015
Ro-Neet 6
EPA Reg. No. 73637-5

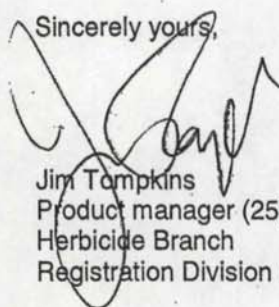
The Agency has conducted a reregistration review of products that contain as an active ingredient of cycloate. The subject product has been reregistered. We have also reviewed the 24 (c) supplement label for this product (copy enclosed). We request the following changes be made regarding entry into treated areas:

- ✓ • Entry (including early entry that would otherwise be permitted under the WPS) by any person – other than a correctly trained and equipped handler who is performing a handling task permitted by the WPS -- is PROHIBITED for 48 hours following application. Do not allow entry by unprotected persons into the treated area until 48-hour period is expired and the warning signs are removed."
- ✓ • NOTIFICATION: Before the start of the application, notify workers of the application by warning them orally and by posting warning signs at entrances to the treated area. The signs must bear the skull and crossbones symbol and state: (1) "DANGER/PELIGRO," (2) "DO NOT ENTER/NO ENTRE," (3) the date and time of treatment, (4) "Cycloate {or use other brand name} in use," and (5) name, address, and telephone number of the applicator. Post the warning sign instead of the WPS sign for this application, but follow all WPS requirements pertaining to location, legibility, size, and timing of posting and removal." Since the signal word is Caution for this product, why the word Danger is required?
- ✓ • Special Early Entry Exception: Workers may enter the treated area during the first 48 hours following application to plant crops, provided all of the following conditions are met:

- ✓ (1) The special early entry workers must use motorized ground equipment that is equipped with an enclosed cab that meets the definition in the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(5)] for dermal protection. In addition, these workers must:
- Wear the personal protective equipment required in the PPE section of this labeling for applicators,
 - *Either* wear the type of respirator specified in the PPE section of this labeling *or* use an enclosed cab with a properly functioning ventilation system that is used and maintained according to the manufacturer's written operating instructions and that is declared in writing by the manufacturer or by a government agency to provide at least as much respiratory protection as the type of respirator specified in the PPE section of this labeling,
 - Be provided and have immediately available for use in an emergency when they must exit the cab in the treated area: chemical-resistant gloves made of any waterproof materials; and, if using an enclosed cab that provides respiratory protection, a respirator of the type specified in the PPE section of this labeling,
 - Take off any PPE that was worn in the treated area before reentering the cab, and
 - Store all such PPE in an appropriate chemical-resistant container to prevent contamination of the inside of the cab.
- ✓ (2) Employers of the special early entry workers must make sure that these workers:
- Have received training equivalent to WPS pesticide handler training before entering the treated area,
 - Are provided with the specified type of respirator, and the respirator fits them correctly and is maintained as required in the WPS for handlers, and
 - Are provided all of the WPS protections for early entry workers, including PPE instructions, labeling information and instructions, decontamination sites, and duties related to providing, cleaning, and maintaining the PPE for early-entry workers."

Please contact us if you have any questions.

Sincerely yours,



Jim Tompkins
Product manager (25)
Herbicide Branch
Registration Division (7505P)

Enclosure

OLD

PRODUCT INFORMATION

TRI AG, INC.

**REGISTRATION FOR SPECIAL LOCAL NEED
FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF IDAHO**

RO-NEET® 6-E

EPA Reg. No. 73637-5

EPA SLN No. ID-010015

FOR WEED CONTROL IN POSTEMERGENT SUGAR BEETS

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RO-NEET 6-E is a trademark of Helm Agro US, Inc.

EPA SLN NO: ID-010015

24(c) Registrant:
TRI AG, INC.
c/o Helm Agro US, Inc. / Agent
8295 Tournament Drive, Suite 310
Memphis, Tennessee 38125

EPA approved June 12, 2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

July 17, 2008

Mr. George Robinson
Idaho State Department of Agriculture
P.O. Box 790
Boise, ID 83701

Dear Mr. Robinson:

Subject: Special Local Need Label
EPA SLN No. ID-010015
Ro-Neet 6
EPA Reg. No. 73637-5

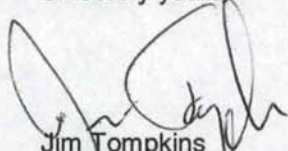
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- NOTIFICATION: Before the start of the application, notify workers of the application by warning them orally and by posting warning signs at entrances to the treated area. The signs must bear the skull and crossbones symbol and state: (1) "DANGER/PELIGRO," (2) "DO NOT ENTER/NO ENTREE," (3) the date and time of treatment, (4) "Cycloate {or use other brand name} in use," and (5) name, address, and telephone number of the applicator. Post the warning sign instead of the WPS sign for this application, but follow all WPS requirements pertaining to location, legibility, size, and timing of posting and removal." Since the signal word is Caution for this product, why the word Danger is required?
- Special Early Entry Exception: Workers may enter the treated area during the first 48 hours following application to plant crops, provided all of the following conditions are met:

- (1) The special early entry workers must use motorized ground equipment that is equipped with an enclosed cab that meets the definition in the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(5)] for dermal protection. In addition, these workers must:
- Wear the personal protective equipment required in the PPE section of this labeling for applicators,
 - *Either* wear the type of respirator specified in the PPE section of this labeling *or* use an enclosed cab with a properly functioning ventilation system that is used and maintained according to the manufacturer's written operating instructions and that is declared in writing by the manufacturer or by a government agency to provide at least as much respiratory protection as the type of respirator specified in the PPE section of this labeling,
 - Be provided and have immediately available for use in an emergency when they must exit the cab in the treated area: chemical-resistant gloves made of any waterproof materials, and, if using an enclosed cab that provides respiratory protection, a respirator of the type specified in the PPE section of this labeling,
 - Take off any PPE that was worn in the treated area before reentering the cab, and
 - Store all such PPE in an appropriate chemical-resistant container to prevent contamination of the inside of the cab.
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 - Are provided with the specified type of respirator, and the respirator fits them correctly and is maintained as required in the WPS for handlers, and
 - Are provided all of the WPS protections for early entry workers, including PPE instructions, labeling information and instructions, decontamination sites, and duties related to providing, cleaning, and maintaining the PPE for early-entry workers."

Please contact us if you have any questions.

Sincerely yours



Jim Tompkins
Product manager (25)
Herbicide Branch
Registration Division (7505P)

Enclosure

Date: April 17, 2008

Reg. No.: 073637-005

SLN Nos.: ID010015

OR010022

OR010023

WA010021

WA010023

WA020003

Product Name: RO-NEET 6-E Selective Herbicide

PM Name/Number: Jim Tompkins, PM 25

Primary Reviewer: Judy Loranger (Signed/JL/5/27/08)

Secondary Reviewer: Larry Schnaubelt (2nd/LS/5/23/08)

New label or date of RD amended label: New, no received date appears on Section 3 label.

Formulation Type: Emulsifiable Concentrate

Active Ingredient Assessed: Cycloate/041301

Other ai's in product

Name/PC code:

N/A

Reregistration Status or Registration Date:

N/A

Note to PM: This assessment includes the parent product 73637-5 and 6 SLNs (ID010015, OR010022, OR010023, WA010021, WA010023, and WA020003).

Assessment can be found Q:\prb\label\073637\005

Comments on the Section 3 parent product:

1) A footnote must be added to the ingredient statement that states that this product "Contains hydrocarbon solvent" as noted on Page 2 of the label.

2) The "IF SWALLOWED" statements appearing in the First Aid section must be revised to read:

"Immediately call a poison control center or doctor.

Do not induce vomiting unless told to by a poison control center or doctor.

Do not give any liquid to the person.

Do not give anything by mouth to an unconscious person."

Based on toxicity ranking per the acute toxicity review, the First Aid statements should be placed on the label in the following order:

"IF SWALLOWED:...
IF ON SKIN OR CLOTHING:...
IF IN EYES:...
IF INHALED:..."

3) Per the acute toxicity review, the text "May pose an aspiration pneumonia hazard" must be added to the Note to Physician currently on the label.

4) Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

"CAUTION

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing."

5) Per the acute toxicity review and the RED, the first sentence in the PPE section must be revised to read:

"Some materials that are chemical-resistant to this product **are made of barrier laminate, nitrile rubber, neoprene rubber, or viton**. If you want more options, follow the instructions for category E on an EPA chemical-resistance category selection chart."

6) Per the RED, the last sentence in the Environmental Hazard statements must be revised to read "Do not contaminate water when disposing of equipment wash water **or rinsate**."

7) Two typographical errors need to be corrected in the Agricultural Use Requirements box:

- Revise "ll" to read "all" in the 5th bullet under the heading Special Early Entry Exceptions.

-Revise "rpoviding" to read "providing" in the last sentence in the Agricultural Use Requirements box.

8) Per the product chemistry review, the following revisions are needed to the storage and disposal section of the label:

Revise the heading "Container Disposal" to read "Container Handling."

Add the text "Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose" under the Container Handling section.

Remove the text "Open dumping is prohibited" from this section of the label.

9) Per the RED, the following text must be added to use directions for dry bulk fertilizer:

"Impregnation of dry bulk fertilizer is permitted in commercial settings only. On-farm impregnation of dry bulk fertilizer is prohibited. All persons involved in the impregnation process are considered pesticide handlers and must wear the handler personal protective equipment and follow the engineering control requirements specified on this labeling. If at any time during the impregnation process, including loading of the impregnated fertilizer into the trucks for transporting, the system does not provide inhalation protection equivalent to an organic-vapor removing respirator, all persons, at the impregnation site must wear the respirator required on this labeling for handlers."

Although the label references "Appendix I and II" for special instructions for impregnation and use, Appendix 1 and II are missing from the label. This text must be submitted for review.

Comments on the SLNs:

OR010022, OR010023, WA010021, WA010023 and WA020003:

Per the RED, the reentry section must be revised to read as specified below.

"Entry (including early entry that would otherwise be permitted under the WPS) by any person – other than a correctly trained and equipped handler who is performing a handling task permitted by the WPS -- is PROHIBITED for 48 hours following application. Do not allow entry by unprotected persons into the treated area until 48-hour period is expired and the warning signs are removed."

"NOTIFICATION: Before the start of the application, notify workers of the application by warning them orally and by posting warning signs at entrances to the treated area. The signs must bear the skull and crossbones symbol and state: (1) "DANGER/PELIGRO," (2) "DO NOT ENTER/NO ENTRE," (3) the date and time of treatment, (4) "Cycloate {or use other brand name} in use," and (5) name, address, and telephone number of the applicator. Post the warning sign instead of the WPS sign for this application, but follow all WPS requirements pertaining to location, legibility, size, and timing of posting and removal."

"Special Early Entry Exception: Workers may enter the treated area during the first 48 hours following application to plant crops, provided all of the following conditions are met:

- (1) The special early entry workers must use motorized ground equipment that is equipped with an enclosed cab that meets the definition in the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(5)] for dermal protection. In addition, these workers must:
 - Wear the personal protective equipment required in the PPE section of this labeling for applicators,

– *Either* wear the type of respirator specified in the PPE section of this labeling *or* use an enclosed cab with a properly functioning ventilation system that is used and maintained according to the manufacturer's written operating instructions and that is declared in writing by the manufacturer or by a government agency to provide at least as much respiratory protection as the type of respirator specified in the PPE section of this labeling,

– Be provided and have immediately available for use in an emergency when they must exit the cab in the treated area: chemical-resistant gloves, and, if using an enclosed cab that provides respiratory protection, a respirator of the type specified in the PPE section of this labeling,

– Take off any PPE that was worn in the treated area before reentering the cab, and

– Store all such PPE in a chemical-resistant container, such as a plastic bag, to prevent contamination of the inside of the cab.

(2) Employers of the special early entry workers must make sure that these workers:

– Have received training equivalent to WPS pesticide handler training before entering the treated area,

– Are provided with the specified type of respirator, and the respirator fits them correctly and is maintained as required in the WPS for handlers, and

– Are provided all of the WPS protections for early entry workers, including PPE instructions, labeling information and instructions, decontamination sites, and duties related to providing, cleaning, and maintaining the PPE for early-entry workers.”

8A-2-13

Material to be added to a Mini-Jacket
(in the case where an e-Jacket exists)

Reg. No. 10010015

Send to SIG: check box ☐

This material is:

- ☐ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label

☒ Other: Add to f.l.

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Erik Kvald

Phone: 308-5352 Division: LD

Date: 6-12-00



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

G-12-00

Tri-Ag, Inc.
375 Park Avenue, 11th Floor
New York, NY 10152

Subject: EPA SLN No. ID010015 / Reregistration

The amended label is in compliance with the Cycloate RED provided you make the following changes:

1. Add "to the extent consistent with applicable law" in front of "In no event" and "The exclusive remedy".

If you have any questions please contact Erik Kraft at 703-308-9358 or Kraft.Erik@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jim Tompkins".

Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

PRODUCT INFORMATION

TRI AG, INC.

**REGISTRATION FOR SPECIAL LOCAL NEED
FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF IDAHO**

RO-NEET® 6-E

EPA Reg. No. 73637-5

EPA SLN No. ID-010015

FOR WEED CONTROL IN POSTEMERGENT SUGAR BEETS

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

SUGAR BEETS: Postemergence (After The First True Leaves Have Formed) Apply 1/2 - 2/3 gallon per acre of RO-NEET 6-E after thinning and clean cultivation and incorporate to a depth of 2 to 3 inches.

or

Surface apply 1/2 - 2/3 gallon per acre of RO-NEET 6-E and incorporate using 1/2 - 3/4 inch of sprinkler irrigation water, or enough water to penetrate the soil to a depth of 3 - 4".

or

Meter 1/2 - 2/3 gallon per acre of RO-NEET 6-E into the sprinkler irrigation system using a metering device that will introduce a constant flow. Meter into sufficient water to penetrate to a depth of 3-4 inches. Time the application to insure that proper soil penetration corresponds to the end of the irrigation set. Turn the water off promptly after flushing all lines. Use the lower rate on sandy soils and the higher rate on heavier soils.

All incorporations must occur immediately after application.

Do not tank-mix with Betamix. For a list of weeds controlled see EPA registered RO-NEET 6-E label.

Apply this product only through sprinklers, including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand moved. Do not apply this product through any other type of irrigation system.

- Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.
- If you have any questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER IRRIGATION USE REQUIREMENTS:

- The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

- The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
- The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
- Do not apply when wind speed favors drift beyond the area intended for treatment.

All applicable directions, restrictions and precautions on the EPA-registered label are to be followed.

This labeling must be in the possession of the user at the time of pesticide application.

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of TRI AG or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold TRI AG and Seller harmless for any claims relating to such factors.

TRI AG warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or TRI AG, and Buyer and User assume the risk of any such use. TRI AG MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall TRI AG or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TRI AG AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TRI AG OR SELLER, THE REPLACEMENT OF THE PRODUCT.

TRI AG and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of TRI AG.

RO-NEET 6-E is a trademark of Helm Agro US, Inc.
24(c) Registrant: TRI AG, INC.
c/o Helm Agro US, Inc. / Agent

EPA SLN NO: ID-010015

8295 Tournament Drive, Suite 300
Memphis, Tennessee 38125



PRODUCT REREGISTRATION
SUPPORTING DOCUMENTATION
FOR

Case Name:

Cycloate

Reg. No.

SLN ID-010015

This supporting documentation (in chronological order) includes:

- Old labels (identified as "Superseded by label dated x/xx/xx")
- Unacceptable CSFs (marked "Not Acceptable" and dated)
- Product chemistry reviews
- Acute Toxicity reviews
- Efficacy reviews (if necessary)
- 90-day responses to PDCl (Form A and Form B)
- Administrative forms (Application for Reregistration, Certification to Data Citation, Data Matrix)
- Correspondence

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. SLN = ID-010015

Send to SIG: check box ☐

This material is:

€ New stamped-accepted label

€ New CSF

€ Notification

€ Final Printed Label

€ Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Stokes

Phone: _____ Division: SLRD

Date: _____

5/29/08

Date: April 17, 2008

Reg. No.: 073637-005

SLN Nos.: ID010015

OR010022

OR010023

WA010021

WA010023

WA020003

Product Name: RO-NEET 6-E Selective Herbicide

PM Name/Number: Jim Tompkins, PM 25

Primary Reviewer: Judy Loranger (Signed/JL/5/27/08)

Secondary Reviewer: Larry Schnaubelt (2nd/LS/5/23/08)

New label or date of RD amended label: New, no received date appears on Section 3 label.

Formulation Type: Emulsifiable Concentrate

Active Ingredient Assessed: Cycloate/041301

Other ai's in product

Name/PC code:

N/A

Reregistration Status or Registration Date:

N/A

Note to PM: This assessment includes the parent product 73637-5 and 6 SLNs (ID010015, OR010022, OR010023, WA010021, WA010023, and WA020003).

Assessment can be found Q:\prb\label\073637\005

Comments on the Section 3 parent product:

1) A footnote must be added to the ingredient statement that states that this product "Contains hydrocarbon solvent" as noted on Page 2 of the label.

2) The "IF SWALLOWED" statements appearing in the First Aid section must be revised to read:

"Immediately call a poison control center or doctor.

Do not induce vomiting unless told to by a poison control center or doctor.

Do not give any liquid to the person.

Do not give anything by mouth to an unconscious person."

Based on toxicity ranking per the acute toxicity review, the First Aid statements should be placed on the label in the following order:

“IF SWALLOWED:…
IF ON SKIN OR CLOTHING:…
IF IN EYES:…
IF INHALED:…”

3) Per the acute toxicity review, the text “May pose an aspiration pneumonia hazard” must be added to the Note to Physician currently on the label.

4) Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

“CAUTION

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing.”

5) Per the acute toxicity review and the RED, the first sentence in the PPE section must be revised to read:

“Some materials that are chemical-resistant to this product **are made of barrier laminate, nitrile rubber, neoprene rubber, or viton.** If you want more options, follow the instructions for category E on an EPA chemical-resistance category selection chart.”

6) Per the RED, the last sentence in the Environmental Hazard statements must be revised to read “Do not contaminate water when disposing of equipment wash water **or rinsate.**”

7) Two typographical errors need to be corrected in the Agricultural Use Requirements box:

- Revise “ll” to read “all” in the 5th bullet under the heading Special Early Entry Exceptions.

-Revise “rpoviding” to read “providing” in the last sentence in the Agricultural Use Requirements box.

8) Per the product chemistry review, the following revisions are needed to the storage and disposal section of the label:

Revise the heading “Container Disposal” to read “Container Handling.”

Add the text “Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose” under the Container Handling section.

Remove the text “Open dumping is prohibited” from this section of the label.

9) Per the RED, the following text must be added to use directions for dry bulk fertilizer:

"Impregnation of dry bulk fertilizer is permitted in commercial settings only. On-farm impregnation of dry bulk fertilizer is prohibited. All persons involved in the impregnation process are considered pesticide handlers and must wear the handler personal protective equipment and follow the engineering control requirements specified on this labeling. If at any time during the impregnation process, including loading of the impregnated fertilizer into the trucks for transporting, the system does not provide inhalation protection equivalent to an organic-vapor removing respirator, all persons, at the impregnation site must wear the respirator required on this labeling for handlers."

Although the label references "Appendix I and II" for special instructions for impregnation and use, Appendix 1 and II are missing from the label. This text must be submitted for review.

Comments on the SLNs:

OR010022, OR010023, WA010021, WA010023 and WA020003:

Per the RED, the reentry section must be revised to read as specified below.

"Entry (including early entry that would otherwise be permitted under the WPS) by any person -- other than a correctly trained and equipped handler who is performing a handling task permitted by the WPS -- is PROHIBITED for 48 hours following application. Do not allow entry by unprotected persons into the treated area until 48-hour period is expired and the warning signs are removed."

"NOTIFICATION: Before the start of the application, notify workers of the application by warning them orally and by posting warning signs at entrances to the treated area. The signs must bear the skull and crossbones symbol and state: (1) "DANGER/PELIGRO," (2) "DO NOT ENTER/NO ENTRE," (3) the date and time of treatment, (4) "Cycloate {or use other brand name} in use," and (5) name, address, and telephone number of the applicator. Post the warning sign instead of the WPS sign for this application, but follow all WPS requirements pertaining to location, legibility, size, and timing of posting and removal."

"Special Early Entry Exception: Workers may enter the treated area during the first 48 hours following application to plant crops, provided all of the following conditions are met:

- (1) The special early entry workers must use motorized ground equipment that is equipped with an enclosed cab that meets the definition in the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(5)] for dermal protection. In addition, these workers must:
 - Wear the personal protective equipment required in the PPE section of this labeling for applicators,

– *Either* wear the type of respirator specified in the PPE section of this labeling *or* use an enclosed cab with a properly functioning ventilation system that is used and maintained according to the manufacturer's written operating instructions and that is declared in writing by the manufacturer or by a government agency to provide at least as much respiratory protection as the type of respirator specified in the PPE section of this labeling,

– Be provided and have immediately available for use in an emergency when they must exit the cab in the treated area: chemical-resistant gloves, and, if using an enclosed cab that provides respiratory protection, a respirator of the type specified in the PPE section of this labeling,

– Take off any PPE that was worn in the treated area before reentering the cab, and

– Store all such PPE in a chemical-resistant container, such as a plastic bag, to prevent contamination of the inside of the cab.

(2) Employers of the special early entry workers must make sure that these workers:

– Have received training equivalent to WPS pesticide handler training before entering the treated area,

– Are provided with the specified type of respirator, and the respirator fits them correctly and is maintained as required in the WPS for handlers, and

– Are provided all of the WPS protections for early entry workers, including PPE instructions, labeling information and instructions, decontamination sites, and duties related to providing, cleaning, and maintaining the PPE for early-entry workers.”

PRODUCT INFORMATION

TRI AG, INC.

REGISTRATION FOR SPECIAL LOCAL NEED FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF IDAHO

RO-NEET® 6-E

EPA Reg. No. 73637-5

EPA SLN No. ID-010015

FOR WEED CONTROL IN POSTEMERGENT SUGAR BEETS

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

SUGAR BEETS: Postemergence (After The First True Leaves Have Formed) Apply 1/2 - 2/3 gallon per acre of RO-NEET 6-E after thinning and clean cultivation and incorporate to a depth of 2 to 3 inches.

or

Surface apply 1/2 - 2/3 gallon per acre of RO-NEET 6-E and incorporate using 1/2 - 3/4 inch of sprinkler irrigation water, or enough water to penetrate the soil to a depth of 3 - 4".

or

Meter 1/2 - 2/3 gallon per acre of RO-NEET 6-E into the sprinkler irrigation system using a metering device that will introduce a constant flow. Meter into sufficient water to penetrate to a depth of 3-4 inches. Time the application to insure that proper soil penetration corresponds to the end of the irrigation set. Turn the water off promptly after flushing all lines. Use the lower rate on sandy soils and the higher rate on heavier soils.

All incorporations must occur immediately after application.

Do not tank-mix with Betamix. For a list of weeds controlled see EPA registered RO-NEET 6-E label.

Apply this product only through sprinklers, including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand moved. Do not apply this product through any other type of irrigation system.

- Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.
- If you have any questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER IRRIGATION USE REQUIREMENTS:

- The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

- The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
- The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
- Do not apply when wind speed favors drift beyond the area intended for treatment.

All applicable directions, restrictions and precautions on the EPA-registered label are to be followed.

This labeling must be in the possession of the user at the time of pesticide application.

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of TRI AG or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold TRI AG and Seller harmless for any claims relating to such factors.

TRI AG warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or TRI AG, and Buyer and User assume the risk of any such use. TRI AG MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall TRI AG or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TRI AG AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES, INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE, RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TRI AG OR SELLER, THE REPLACEMENT OF THE PRODUCT.

TRI AG and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of TRI AG.

RO-NEET 6-E is a trademark of Helm Agro US, Inc.

24(c) Registrant: TRI AG, INC.

c/o Helm Agro US, Inc. / Agent

EPA SLN NO: ID-010015

8295 Tournament Drive, Suite 310
Memphis, Tennessee 38125

Wd3

00.42.04



"Brenda Dowdy" <bdowdy@hilmagro.com>

03/20/2008 05:52 PM

Please respond to
"Brenda Dowdy"
<bdowdy@hilmagro.com>

To Julia Stokes/DC/USEPA/US@EPA

cc <bertvolger@comcast.net>

bcc

Subject Helm Agro US SLN Registrations

Per your request of Bert Volger, please find SLNs attached. Sending both the TRI SLN and the Helm SLN.

ID010015	SLN of 73637-5	
OR010022	SLN of 73637-5	
OR010023	SLN of 73637-5	
WA010021	SLN of 73637-5	
WA010022	SLN of 73637-5	Canceled with the state and the EPA
WA010023	SLN of 73637-5	
WA020003	SLN of 73637-5	
MI050005	SLN of 73637-5	Added to your list.

Regards,
Brenda Dowdy
Helm Agro US, Inc.
8295 Tournament Drive., Suite 310
Memphis, TN 38125
901/312-1525

3.21.08
BDS



Idaho SLN HAI.pdf Idaho SLN TriAg .wpd OR SLN HAI 010023 till 2011.pdf OR SLN HAI 010022 till 2011.pdf OR SLN TriAg 010023 till 2011.pdf OR SLN TriAg 010022 till 2011.wpd



Washington SLN TriAg 020003 - 02-26-2008.doc Washington SLN HAI 010021c - 02-26-2008.pdf Washington SLN HAI 010023c - 02-28-2008.pdf



Washington SLN HAI 020003c - 02-26-2008.pdf Washington SLN TriAg 010021 - 02-26-2008.doc Washington SLN TriAg 010023 - 02-28-2008.doc



MI SLN HAI MI-050005 Final 5-24-07.pdf

3.31.08
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